

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

CENTRIPETAL NETWORKS, LLC,	§	
Plaintiff,	§	Civil Action No. 2:21-CV-00137-EWH-LRL
v.	§	
PALO ALTO NETWORKS, INC.,	§	
Defendant.	§	

**DEFENDANT PALO ALTO NETWORKS, INC.’S MOTION
FOR SUMMARY JUDGMENT ON U.S. PATENT NOS. 10,567,437;
10,735,380; 10,530,903; 10,659,573; 10,931,797**

Pursuant to Federal Rule of Civil Procedure 56, Defendant Palo Alto Networks, Inc. moves for summary judgment as a matter of law concerning U.S. Patent Nos. 10,567,437; 10,735,380; 10,530,903; 10,659,573; 10,931,797. For the reasons explained in the accompanying memorandum, summary judgment is proper on the following grounds:

- Claim 8 of U.S. Patent No. 10,567,437 (“437 patent”) is not infringed by any accused Palo Alto Networks products or accused combination of such products;
- Claims 16 and 25 of U.S. Patent No. 10,735,380 (“380 patent”) are not infringed by any accused Palo Alto Networks products or accused combination of such products;
- Claim 10 of U.S. Patent No. 10,530,903 (“903 patent”); claims 1 and 9 of U.S. Patent No. 10,659,573 (“573 patent”); and claims 1, 12, and 17 of U.S. Patent No. 10,931,797 (“797 patent”) are not infringed by any accused Palo Alto Networks products or accused combination of such products;
- Centripetal has not met its burden as to indirect infringement for any asserted patent;

- Claim 8 of the '437 patent is invalid under 35 U.S.C. § 112 for lack of written description;
- Centripetal has not met its burden as to pre-suit willfulness for any asserted patent;
- Centripetal has not met its burden as to post-suit willfulness for any asserted patent;
- Centripetal cannot recover damages for alleged infringement of the asserted method claims ('573 patent, claim 1; '797 patent, claim 1) based on sales and use of any accused Palo Alto Networks products or accused combination of such products outside the United States; and
- Centripetal cannot recover damages for alleged infringement of the asserted apparatus claims ('903 patent, claim 10; '573 patent, claim 9; '797 patent, claims 12, 17; '437 patent, claim 8; '380 patent, claims 16, 25) based on sales and use of any accused combination of Palo Alto Networks products outside the United States.

Dated: October 26, 2023

Respectfully submitted,

PALO ALTO NETWORKS, INC.
By Counsel

By: /s/ Robert W. McFarland

Robert W. McFarland (VSB No. 24021)

MCGUIREWOODS LLP

101 W. Main Street, Suite 9000

Norfolk, Virginia 23510

Telephone: (757) 640-3716

Facsimile: (757) 640-3966

E-mail: rmcfarland@mcguirewoods.com

Jonathan P. Harmon (VSB No. 39081)

David E. Finkelson (VSB No. 44059)

MCGUIREWOODS LLP

Gateway Plaza

800 East Canal Street

Richmond, VA 23219-3916

Telephone: (804) 775-1000

Facsimile: (804) 775-1061

E-mail: jharmon@mcguirewoods.com

E-mail: dfinkelson@mcguirewoods.com

Brett C. Govett (Admitted *Pro Hac Vice*)

James S. Renard (Admitted *Pro Hac Vice*)

Jacqueline Baker (Admitted *Pro Hac Vice*)

NORTON ROSE FULBRIGHT US LLP

2200 Ross Avenue, Suite 3600

Dallas, Texas 75201

Telephone: (214) 855-8000

brett.govett@nortonrosefulbright.com

james.renard@nortonrosefulbright.com

jackie.baker@nortonrosefulbright.com

Richard Zembek (Admitted *Pro Hac Vice*)

Daniel S. Leventhal (Admitted *Pro Hac Vice*)

Daniel A. Prati (Admitted *Pro Hac Vice*)

NORTON ROSE FULBRIGHT US LLP

1301 McKinney Street, Suite 5100

Houston, Texas 77010

Telephone: (713) 651-5151

richard.zembek@nortonrosefulbright.com

daniel.leventhal@nortonrosefulbright.com

daniel.prati@nortonrosefulbright.com

Stephanie DeBrow (Admitted *Pro Hac Vice*)
Talbot R. Hansum (Admitted *Pro Hac Vice*)
NORTON ROSE FULBRIGHT US LLP
98 San Jacinto Boulevard, Suite 1100
Austin, Texas 78701
Telephone: (512) 474-5201
stephanie.debrow@nortonrosefulbright.com
talbot.hansum@nortonrosefulbright.com

James R. Batchelder (Admitted *Pro Hac Vice*)
Andrew T. Radsch (Admitted *Pro Hac Vice*)
ROPES & GRAY LLP
1900 University Avenue, 6th Floor
East Palo Alto, CA 94303
Telephone: (650) 617-4000
james.batchelder@ropesgray.com
andrew.radsch@ropesgray.com

Josef B. Schenker (Admitted *Pro Hac Vice*)
ROPES & GRAY LLP
1211 Avenue of the Americas
New York, NY 10036-8704
Telephone: (212) 596-9000
josef.schenker@ropesgray.com

COUNSEL FOR PALO ALTO NETWORKS, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 26, 2023, the foregoing was filed with the Clerk of the Court using the CM/ECF system, which will automatically send notification of electronic filing to all counsel of record.

/s/ Robert W. McFarland

Robert W. McFarland (VSB No. 24021)

MCGUIREWOODS LLP

101 W. Main Street, Suite 9000

Norfolk, Virginia 23510

Telephone: (757) 640-3716

Facsimile: (757) 640-3966

E-mail: rmcfarland@mcguirewoods.com

COUNSEL FOR PALO ALTO NETWORKS, INC.